

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SHERRY BROWN,

Plaintiff,

v.

**ASSET ACCEPTANCE, LLC (D/B/A
MIDLAND CREDIT MNGT.),**

Defendant.

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: **Case No.**
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NOTICE OF REMOVAL

**To: Clerk – United States District Court for the
Middle District of Pennsylvania**

PLEASE TAKE NOTICE THAT on this date, Defendant Asset Acceptance, LLC (d/b/a Midland Credit Mngt.), hereby removes the above-captioned matter to this Court from the Court of Common Pleas of York County, and in support thereof avers as follows:

1. Defendant Asset Acceptance, LLC (d/b/a Midland Credit Mngt.) is a defendant in a civil action originally filed on or about June 26, 2017, in the Court of Common Pleas of York County, titled *Sherry Brown v. Asset Acceptance, LLC (d/b/a Midland Credit Mngt.)*, and docketed to Case No. 2017-SU-001720.

2. This removal is timely under 28 U.S.C. § 1446(b). Defendant first received a copy of Plaintiff's Complaint by service on or about July 6, 2017.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all process, pleadings and orders received by Defendant in the state court action.

4. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, Defendant has provided notice of this removal to all parties and to the Court of Common Pleas of York County, Pennsylvania

WHEREFORE, Defendant removes this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

BARRON & NEWBURGER, P.C.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
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Counsel for Defendant Asset Acceptance, LLC
(d/b/a Midland Mngt.)

Dated: August 3, 2017

CERTIFICATE OF SERVICE

I certify that on August 3, 2017, a true copy of the foregoing document was served on Plaintiff's Counsel below via electronic means:

Fred Davis, Esq.
Davis Consumer Law Firm
500 Office Ctr Dr., Suite 400
Fort Washington, PA 19034
Counsel for Plaintiff

I further certify that on August 3, 2017, a true copy of the foregoing document was served on the persons below via U.S. Mail, postage pre-paid:

Prothonotary – Civil Division
Court of Common Pleas
York County Judicial Center
45 North George Street
York, PA 17401

BARRON & NEWBURGER, P.C.

By: /s/ Lauren M. Burnette
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Counsel for Defendant Asset Acceptance, LLC
(d/b/a Midland Mngt.)

Dated: August 3, 2017